

IN THE COURT OF APPEALS
FOR THE SECOND COURT OF APPEALS DISTRICT
FORT WORTH, TEXAS

SULIA LAWRENCE BROWN
APPELLANT

VS.

THE STATE OF TEXAS
APPELLEE

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FILED IN
2nd COURT OF APPEALS
FORT WORTH, TEXAS
5/31/2019 3:28:12 PM
DEBRA SPISAK
Clerk
NO: 02-19-00064-CR

**APPELLANT'S MOTION FOR EXTENSION
OF TIME FOR FILING APPELLANT'S BRIEF**

NOW COMES, SULIA LAWRENCE BROWN, Appellant, by and through his attorney, WES BALL, and requests that he be granted an extension of time for filing his brief in the above-styled and numbered cause. As grounds for granting this motion, Appellant states:

The undersigned counsel is responsible for filing the Appellant's brief in this case. Appellant seeks an extension of seven (7) days to June 10, 2019. Appellant's counsel seeks the extension due to a need for this additional time to adequately prepare Appellant's brief. Due to his caseload in both trial and appellate courts, he has been unable to complete the brief.

Appellant's counsel was required to prepare for a bench trial; Appellant's counsel tried case on Tuesday, May 28, 2019 in case styled, *The State of Texas v. Luke Miller*, County Criminal Court No. 6, Tarrant County, Texas.

Appellant's brief is currently due on June 3, 2019. The order denying Appellant's requested habeas relief was entered on January 29, 2019 by a Magistrate Judge presiding in the Criminal District Court Number One of Tarrant County, Texas.

Appellant has been committed for nearly 7 years in a matter that originated in the 323rd District Court of Tarrant County, Texas. This case is a juvenile case. Appellant has continuously been unfit to proceed or incompetent to stand trial for the entire period and has been committed to a

State mental health facility. His juvenile case was transferred to Criminal District Court Number One pursuant to §55.44 Texas Family Code based on Appellant having reached his 18th birthday.

Notice of Appeal was entered on February 12, 2019. The cause number in the trial court was 1503867. One extension of time has been previously granted in this cause. Counsel requests an extension of seven (7) days. This request is not being made for mere purpose of delay, but so that justice can be done.

WHEREFORE PREMISES CONSIDERED, Appellant prays that this Honorable Court grant an extension of seven (7) days for filing his brief on appeal to June 10, 2019.

Respectfully submitted,

/s/ Wes Ball

WES BALL

State Bar No. 01643100

4025 Woodland Park Blvd., Suite 370

Arlington, Texas 76013

Email: WBnotices@ballhase.com

Telephone: (817)860-5000

Fax No.: (817)860-6645

ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

On this the 31st day of May, 2019, a true and correct copy of the above and foregoing Appellant's Motion for Extension of Time for Filing Appellant's Brief was delivered electronically to the Post-Conviction Division of the Tarrant County District Attorney's Office.

/s/ Wes Ball

WES BALL

Attorney for Appellant

CERTIFICATE OF CONFERENCE

On the 31st day of May, 2019, Malinda Davis, assistant to Appellant's counsel, attempted to contact, but without success, the Tarrant County District Attorney Chief of Post-Conviction, regarding the foregoing Motion.

/s/ Wes Ball _____
WES BALL